

Remarks

Claims 1, 5-16 and 18-20 are pending. Claims 2- 4 and 17 are canceled in this Response.

Claims 1-20 were rejected under Section 102(e) as being anticipated by Howard (6823526). The brief remarks made in support of the rejection of all of the claims are quoted below in full.

"With regards to claims 1-20, Howard either explicitly or inherently teaches all of the claimed limitations which is evidenced by that fact that Howard discloses a system for connecting an external device and a host system that includes an input/output code element on a host system linked with an external device. (Note 'interface module' (see lines 27-46 of column 5), 'printer driver' (see lines 27-46 of column 5) and 'add-on module' (column 5, line 26- col. 9, line 64) as claimed by the applicant and taught by Howard et al. (Howard) (S 6,823,526)." Office Action, page 2.

The Office carries the initial burden of establishing a prima facie case of anticipation. To meet this burden, the Office must show that the reference teaches "each and every element as set forth in the claim." MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987)). "[A]nticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." See, e.g., *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1456 (Fed. Cir. 1984) (emphasis added).

Claim 1 has been amended to incorporate limitations from Claims 2 and 4. Claim 1 as amended recites (1) receiving a call from the printer driver indicating that a print job is initiated, (2) determining whether any of the add-on modules are responsive to the call, and, (3) in response to determining that an add-on module is responsive to the call, connecting the responsive add-on module to the printer driver via the interface module. Claim 16 is a computer program product counterpart to the method of Claim 1 and recites similar limitations.

Even if it is assumed for purposes of argument only that Howard's i/o code element 33 and device add-on features are the claimed interface and add-on modules, the Office has made no showing that Howard teaches the receiving, determining and

connecting steps noted above as items (1), (2) and (3). In fact, Howard does not teach these steps. Howard teaches only that an i/o code element 33 modifies a template 40 to generate an initialization string for an external device (e.g., a printer) that includes "relevant add-on features...." Howard, column 6, lines 26-36. So far as applicants can tell, there is nothing in Howard that even remotely suggests any kind of determination is made that any of the add-on features of the external device are responsive to a printer driver call (or even that there is any such call from the printer driver) or connecting a responsive add-on module to the printer driver. If the Office disagrees, it is respectfully requested to ***specifically point out and explain*** those passages in Howard that teach these claim limitations. Absent such a showing, the rejection of Claims 1 and 16 should be withdrawn.

Each of the claims depending from Claims 1 and 16 add further limitations not taught or suggested by Howard. The Office has made no showing that Howard teaches any of these further limitations. Claims 5, 7, 8 and 9, for example, recite characteristics of the add-on modules (e.g., insert print data or a command into the print stream) that seem to be inconsistent with the add-on features of the external device in Howard (e.g., expanded memory or optional feeder tray for a printer). Again, if the Office disagrees, it is respectfully requested to ***specifically point out and explain*** those passages in Howard that teach each of the further limitations added in the dependent claims.

The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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